

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: RICHARD GREAVES : CHAPTER 13
:
DEBTOR : Bankruptcy No. 18-14407
:
RICHARD GREAVES :
100 E. Glenolden Ave. Unit U-10 :
Glenolden, PA 19036 :
PLAINTIFF :
v. : ADVERSARY NO. 18-217
Wells Fargo Bank, N.A. as Trustee :
Specialized Loan Servicing, LLC :
8742 Lucent Blvd. :
Highlands Ranch, CO 80129 :
DEFENDANT :

STIPULATION IN SETTLEMENT OF DEBTOR'S COMPLAINT TO DETERMINE VALIDITY,
PRIORITY AND EXTENT OF LIEN AND SECURED PURSUANT TO 11 U.S.C. 506 AND
IN RE: MCDONALD

It is hereby stipulated by and among Kevin G. McDonald, Esquire,
counsel for Wells Fargo Bank, and Zachary Perlick, Esquire counsel for
debtor, Richard Greaves, as follows:

1. Wells Fargo Bank, N.A., as Trustee for First Franklin Mortgage Loan Trust 2006-FFA, filed a secured Proof of Claim dated July 6, 2018 in the amount of \$7,606.84.
2. The Debtor filed a Complaint to Determine Validity, Priority and Extent of Lien and Secured Status Pursuant to 11 U.S.C. 506 and In Re: McDonald on September 19, 2018.
3. Wells Fargo Bank, N.A., as Trustee for First Franklin Mortgage Loan Trust 2006-FFA will amend its Proof of Claim to list the debt as unsecured debt.
4. Upon discharge, Wells Fargo Bank, N.A., as Trustee for First Franklin Mortgage Loan Trust 2006-FFA shall mark the mortgage satisfied.
5. If the Chapter 13 Case is dismissed then this agreement is void and the mortgage will remain until paid in full.
6. If the Debtor refinances or sells the property located at 100 E. Glenolden Avenue, U-10, Glenolden, PA 19036 prior to receiving his discharge order, then Wells Fargo Bank, N.A., as Trustee for First Franklin Mortgage Loan Trust 2006-FFA will be paid in full at closing unless a lesser amount is agreed upon by the parties.

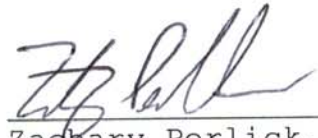
7. Wells Fargo Bank, N.A., as Trustee for First Franklin Mortgage Loan Trust 2006-FFA shall retain its lien on any surplus proceeds from a foreclosure sale by the senior lien holder prior to the debtor's completion of their Chapter 13 Plan and entry of her Chapter 13 discharge.
8. Each party shall bear their own attorney's fees and costs in the adversary proceeding.

Date: October 17, 2018

/s/ Kevin G. McDonald, Esquire

Kevin G. McDonald, Esquire

Counsel for Wells Fargo Bank, N.A., as Trustee for First Franklin Mortgage Loan Trust 2006-FFA



Zachary Perlick, Esquire
Attorney for the Debtor

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vi. : ADVERSARY NO. 18-217
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Highlands Ranch, CO 80129 :
DEFENDANT :

ORDER

AND NOW, this day of November 8, 2018 it is hereby ORDERED
that the foregoing Stipulation is hereby approved and is hereby made an
ORDER of this court.

BY THE COURT:

John K. F. Simon

THE HONORABLE JEAN K. FITZSIMON

SERVICE LIST:

RICHARD GREAVES
100 E. Glenolden Avenue, Unit U-10
Glenolden, PA 19036

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